

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE JP MORGAN CHASE CASH BALANCE LITIGATION)	<u>Via ECF</u> Master File No. 06-cv-0732 (DLC)(THK)
THIS DOCUMENT RELATES TO: ALL ACTIONS)	
FRANK BILELLO, individually and on behalf of all others similarly situated,)	<u>Via ECF</u> Civ. No. 07-CV-7379 (DLC)(THK)
	Plaintiff;)
v.)	
JPMORGAN CHASE RETIREMENT PLAN, JPMORGAN CHASE DIRECTOR OF HUMAN RESOURCES as administrator of the JPMorgan Chase Retirement Plan,)	
	Defendants.)

**NAMED PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, SETTLEMENT CLASS CERTIFICATION, CASE CONTRIBUTION
AWARDS TO NAMED PLAINTIFFS
AND REIMBURSEMENT OF ATTORNEYS' EXPENSES**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 23, the requirements of due process, this Court's Order for Hearing and Notice, dated March 3, 2010, and upon the accompanying Memorandum of Law, declaration and exhibits, Plaintiffs Neil Aldoroty, John J. Berotti, Annette Marie Falchetti, Terri Melli, Norman Schomaker, and Perry Shapiro on their own behalf and on behalf of all similarly situated persons in *In re JPMorgan Chase Cash Balance Litigation*, Master File No. 06-cv-0732 (DLC), and Plaintiff Frank J. Bilello on his own behalf and on behalf of all similarly situated persons in *Bilello v. JP Morgan Chase Retirement*

Plan, et al., No. 07-cv-7379 (DLC), hereby move this Court on June 25, 2010 at 3:00 pm in the Courtroom of the Honorable Denise L. Cote, United States District Judge for the Southern District of New York, Courtroom 11B, United States Courthouse, 500 Pearl Street, New York, New York 10007, or other such location and time as set by the Court, for an Order:

- (1) Granting final approval of the proposed Settlement;
- (2) Consolidating the above-actions and certifying a Class for the purpose of the Settlement;
- (3) Approving case contribution awards to Named Plaintiffs and reimbursing reasonable out-of-pocket expenses to Plaintiffs' Counsel; and
- (4) Entering Final Judgment.

RESPECTFULLY SUBMITTED this 17th day of June, 2010.

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Certificate of Service

I hereby certify that on June 17, 2010, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notification of such filing to the following: Jonathan Youngwood, Thomas C. Rice, Joseph H. Meltzer, Amy Williams-Derry, Peter S. Linden and Edgar Pauk.

/s/Rebecca Song
Rebecca Song